

Christina N. Goodrich (SBN 261722)  
christina.goodrich@klgates.com  
Cassidy T. Young (SBN 342891)  
cassidy.young@klgates.com  
K&L GATES LLP  
10100 Santa Monica Boulevard  
Eighth Floor  
Los Angeles, CA 90067  
Telephone: +1 310 552 5000  
Facsimile: +1 310 552 5001

*Attorneys for Plaintiff  
Entropic Communications, LLC*

**[Additional attorneys listed on  
signature page]**

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

ENTROPIC COMMUNICATIONS,  
LLC,

Plaintiff,

v.

COX COMMUNICATIONS, INC., *et*  
*al.*,

Defendants.

Case No. 2:23-cv-1049-JWH-KES  
(Lead Case)

Case No. 2:23-cv-01050-JWH-KES  
(Related Case)

**STIPULATION TO EXTEND  
ENTROPIC COMMUNICATIONS,  
LLC'S DEADLINE TO RESPOND TO  
COUNTERCLAIMS; [PROPOSED]  
ORDER**

District Judge: Hon. John W. Holcomb  
Magistrate Judge: Hon. Karen E. Scott

Current Deadline: Dec. 8, 2023  
Proposed New Deadline: Dec. 22, 2023

ENTROPIC COMMUNICATIONS,  
LLC,

Plaintiff,

v.

COMCAST CORPORATION., *et al.*,

Defendants.

**STIPULATION TO EXTEND ENTROPIC COMMUNICATIONS, LLC'S  
DEADLINE TO RESPOND TO COUNTERCLAIMS**

1 Plaintiff Entropic Communications, LLC (“Entropic”) and Defendants Cox  
2 Communications, Inc., CoxCom, LLC, and Cox Communications California, LLC  
3 (collectively, “Cox”) (collectively, with Entropic, the “Parties”), by and through their  
4 respective counsel, stipulate and enter into this Joint Stipulation to Extend Entropic’s  
5 Deadline to Respond to Counterclaims:

6 WHEREAS, Cox filed its Amended Answer to the Complaint and Counterclaims  
7 on October 6, 2023 (Dkt. No. 94);

8 WHEREAS, Cox’s Counterclaims (the “Counterclaims”) assert a cause of action  
9 against Entropic, which Entropic is evaluating;

10 Whereas, the Counterclaims assert causes of action against MaxLinear  
11 Communications LLC and MaxLinear, Inc. (collectively, “MaxLinear”);

12 WHEREAS, Entropic’s current deadline to respond to Cox’s Counterclaims is  
13 December 8, 2023 (Dkt. No. 173);

14 WHEREAS, Cox agreed to extend the deadline for MaxLinear to respond to the  
15 Counterclaims;

16 WHEREAS, Cox has agreed to extend the deadline for Entropic to respond to the  
17 Counterclaims to December 22, 2023 provided Entropic agrees to notice any motion to  
18 dismiss the Counterclaims for a hearing no earlier than February 2, 2024;

19 WHEREAS, the Parties have agreed that Cox’s opposition to any motion to  
20 dismiss the Counterclaims filed by Entropic will be filed by January 9, 2024,

21 WHEREAS, the Parties have agreed that Entropic’s reply in support of its motion  
22 to dismiss the Counterclaims will be filed by January 19, 2024;

23 NOW THEREFORE, the Parties, by and through their respective counsel, hereby  
24 STIPULATE AND AGREE as follows:

25 1. The Parties respectfully request an order from the Court extending  
26 Entropic’s deadline to respond to Cox’s Counterclaims (Dkt. No. 94) from December  
27 8, 2023 to December 22, 2023.  
28

2. The Parties further request an order from the Court that any motion to dismiss the Counterclaims be noticed by Entropic no earlier than February 2, 2024.

3. This extension shall not affect the *Markman* schedule.

4. The Parties further request an order from the Court that any opposition by Cox to a motion to dismiss the Counterclaims filed by Entropic be filed no later than January 9, 2024 and any reply in support of such motion to dismiss be filed by Entropic no later than January 19, 2024.

Dated: December 7, 2023

Respectfully Submitted,

By: /s/ Christina N. Goodrich  
Christina N. Goodrich (SBN 261722)  
Cassidy T. Young (SBN 342891)  
**K&L GATES LLP**  
10100 Santa Monica Blvd., 8th Fl.  
Los Angeles, CA 90067  
Tel.: (310) 552-5547  
Fax: (310) 552-5001  
christina.goodrich@klgates.com  
cassidy.young@klgates.com

Peter Soskin (SBN 280347)  
**K&L GATES LLP**  
4 Embarcadero Center, Suite 1200  
San Francisco, CA 94111  
Tel.: (415) 882-8200  
Fax: (415) 882-8220  
peter.soskin@klgates.com

James Shimota (admitted *pro hac vice*)  
George Summerfield (admitted *pro hac vice*)  
**K&L GATES LLP**  
70 W. Madison Street, Suite 3300  
Chicago, IL 60602  
Tel.: (312) 372-1121  
Fax: (312) 827-8000  
jim.shimota@klgates.com

1 Darlene F. Ghavimi (admitted *pro hac vice*)  
2 **K&L GATES LLP**  
3 2801 Via Fortuna, Suite #650  
4 Austin, TX 78746  
5 Tel.: (512) 482-6919  
6 Fax: (512) 482-6859  
7 darlene.ghavimi@klgates.com

8 Kenneth Bridges  
9 **Bridges IP Consulting**  
10 2113 19th Avenue S  
11 Nashville, TN 37212  
12 Tel: (615) 973-9478  
13 bridgesip@icloud.com

14 **ATTORNEYS FOR PLAINTIFF**  
15 **ENTROPIC COMMUNICATIONS, LLC**

16 Dated: December 7, 2023

17 By: /s/ April E. Isaacson  
18 April E. Isaacson (SBN 180638)  
19 aisaacson@kilpatricktownsend.com  
20 Two Embarcadero Center  
21 Suite 1900  
22 San Francisco CA 94111  
23 (415) 273 8306

24 Rishi Gupta (SBN 313079)  
25 rgupta@kilpatricktownsend.com  
26 Sarah Y. Kamran (SBN 347617)  
27 skamran@kilpatricktownsend.com  
28 1801 Century Park East  
Suite 2300  
Los Angeles CA 90067  
(310) 777 3733

Mitchell G. Stockwell (*pro hac vice*)  
mstockwell@kilpatricktownsend.com  
Vaibhav P. Kadaba (*pro hac vice*)  
wkadaba@kilpatricktownsend.com  
Michael J. Turton (*pro hac vice*)

mturton@kilpatricktownsend.com  
Courtney S. Dabbieri (pro hac vice)  
cdabbieri@kilpatricktownsend.com  
Christopher S. Leah (*pro hac vice*)  
cleah@kilpatricktownsend.com  
Andrew N. Saul (pro hac vice)  
asaul@kilpatricktownsend.com

1100 Peachtree Street, NE  
Suite 2800  
Atlanta GA 30309  
(404) 815 6500

**ATTORNEYS FOR DEFENDANTS  
COX COMMUNICATIONS, INC.,  
COXCOM, LLC, AND COX  
COMMUNICATIONS CALIFORNIA, LLC**

**SIGNATURE CERTIFICATION**

Pursuant to Local Rule 5-4.3.4(a)(2)(i), I, Christina N. Goodrich, attest that all other signatories listed above concur in this filing's content and have authorized the filing.

/s/ Christina N. Goodrich